

# Atlantic Richfield Company

**Jack Oman**  
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November 8, 2016

## **VIA EMAIL**

Mr. Dante Rodriguez  
Remedial Project Manager  
U.S. EPA Region 9  
75 Hawthorne Street, SFD-8-2  
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[Rodriguez.Dante@epa.gov](mailto:Rodriguez.Dante@epa.gov)

**Subject: Yerington Paiute Tribe Water Quality Monitoring Program  
Quality Assurance Project Plan, Fourth Version, July 2016 Update; and  
Wabuska Drain (OU-7) Sampling and RI/FS**

Dear Dante:

Jeryl Gardner forwarded your September 7, 2016 email requesting review and feedback on the Yerington Paiute Tribe's (YPT) July 2016 updated Quality Assurance Project Plan (Version 4b) (QAPP) for surface water, sediment, and soil sampling of the Wabuska Drain (OU-7) on and near the YPT Reservation. Atlantic Richfield Company (ARC) prepared the enclosed technical review comments for consideration by EPA and the YPT.

In addition to preparing the enclosed technical comments, ARC has evaluated the QAPP in the broader context of the OU-7 RI/FS. Given the work completed to date, we view the OU-7 sampling proposed by the YPT as duplicative and unnecessary. During 2016, ARC completed the sampling described in the "Wabuska Drain (OU-7) Phase 1 Field Sampling and Analysis Plan," which we submitted to EPA on October 7, 2015, and which was then the subject of follow-up EPA comments, responses to comments, and meeting discussions between ARC and EPA. ARC presented the Phase 1 sampling results during our October 19, 2016 webinar. As we explained, those results show that exceedances of background concentrations of chemicals-of-interest (COIs) are mostly confined to the first approximately 5,000 to 6,000 feet of the current drain alignment and the first approximately 2,000 feet of the historic drain alignment. That is, mine-related impacts generally are not observable beyond a point well south of Campbell Lane and the southern boundary of the YPT reservation. In addition, we did not see any evidence of vertical migration of COIs from the Wabuska Drain to groundwater. It also appears that maintenance activities within the current drain have largely altered the ditch-bottom surface, and agricultural practices are likely affecting ditch soil chemistry to some extent.

In light of these findings, ARC does not believe that additional investigations are needed to address the data quality objectives and study goals for OU-7 or to further refine the conceptual site models described in our July 14, 2015 OU-7 Work Plan. With the possible exception of further differentiating between site-related and agriculturally-derived chemical signatures in Wabuska Drain soils, sufficient data now exist to characterize the nature and extent of mine-related impacts in OU-7 and to support the analysis and design of potential response actions. Accordingly, additional sampling and data collection, whether performed by ARC or the YPT, would not be consistent with the National Contingency Plan's stated purpose for remedial investigations, which is only to "collect data necessary to adequately

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characterize the site for the purpose of developing and evaluating effective remedial alternatives.” See 40 CFR § 300.430(d).

We appreciate the opportunity to review the YPT's QAPP, and we look forward to further discussions with EPA concerning the OU -7 sampling results and the process for completing the OU -7 RI/FS. If work plans are prepared in the future by the YPT relating to OU -7 sampling, we would appreciate having the chance to review them as well.

Sincerely,



Jack Oman  
Project Manager

Attachment

cc: Dave Seter, EPA – via electronic mail  
Jeryl Gardner, NDEP – via electronic mail  
Ron Halsey, Atlantic Richfield Company – via electronic mail  
Nathan Block, Atlantic Richfield Company – via electronic mail  
Patricia Gallery, Atlantic Richfield Company – via electronic mail  
Brian Johnson, Atlantic Richfield Company – via electronic mail  
John Batchelder, EnviroSolve – via electronic mail  
Chuck Zimmerman, Brown and Caldwell – via electronic mail  
Dan Ferriter, Copper Environmental – via electronic mail  
Mike Mahon, Copper Environmental – via electronic mail  
Randy Miller, Broadbent – via electronic mail  
Travis Phelps, Arcadis – via electronic mail  
Adam Cohen, Davis Graham & Stubbs – via electronic mail